

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILLIAM D. WILKS,

Plaintiff,

v.

GLOBAL PAYMENT CHECK SERVICES,
INC.,

Defendant.

Case No. 1:21-cv-00723

Honorable Robert W. Gettleman

JOINT STIPULATION TO ARBITRATE

Plaintiff William D. Wilks and Defendant Global Payment Check Services, Inc. (“Parties”), by and through their undersigned counsel, file this Stipulation of Arbitration to give notice to the Court of their intent to resolve Plaintiff’s claims through binding arbitration. Specifically, the Parties hereby stipulate and agree that, for purposes of this action: (a) paragraph 9 of the Terms of Service for the VIP Preferred Program, which governs Plaintiff’s relationship with Defendant (“Arbitration Provision”) (a true and correct copy of which is attached hereto as “Exhibit 1”), constitutes a valid and enforceable agreement, and as such, Plaintiff will not challenge the Arbitration Provision, in court, arbitration, or otherwise; (b) Plaintiff’s claims are arbitrable under the Arbitration Provision; and (c) Defendant has not waived its right to arbitration. The Parties also stipulate and agree that, by June 14, 2021, Plaintiff will dismiss this matter without prejudice and, if Plaintiff chooses, submit an arbitration demand to the American Arbitration Association.

Entered into this 7th day of June, 2021, by:

/s/ Mohammed O. Badwan

Mohammed O. Badwan

Victor T. Metroff

Sulaiman Law Group, Ltd.

2500 South Highland Avenue, Suite 200

Lombard, Illinois 60148

Telephone: (630) 575-8180

mbadwan@sulaimanlaw.com

vmetroff@sulaimanlaw.com

Counsel for Plaintiff

/s/ Joseph D. Kern

Joseph D. Kern

Hinshaw & Culbertson LLP

151 North Franklin Street, Suite 2500

Chicago, IL 60606

Telephone: 312-704-3000

Facsimile: 312-704-3001

jkern@hinshawlaw.com

Counsel for Defendant

CERTIFICATE OF SERVICE

I hereby certify that on June 7, 2021, I filed the foregoing document using the Court's CM/ECF system, which will send a notice of electronic filing to all parties of record.

By: /s/ Joseph D. Kern
Joseph D. Kern